

Hearing Date and Time: September 27, 2007, at 10:00 A.M.

Response Date and Time: September 20, 2007, at 4:00 P.M.¹

Elena Lazarou (EL-5681)
Reed Smith LLP
559 Lexington Avenue
New York, New York 10022
Telephone: 212-521-5400
Facsimile: 212-521-5450

-and-

Stephen T. Bobo
Reed Smith LLP
10 South Wacker Drive, 40th Floor
Chicago, IL 60606
Telephone: 312-207-1000
Facsimile: 312-207-6400

Attorneys for Johnson Controls Battery Group, Inc.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
	:	
In re	:	
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Chapter 11
	:	
Debtors.	:	Case No. 05-44481 (RDD)
	:	
	:	(Jointly Administered)
	:	
-----X		

JOHNSON CONTROLS BATTERY GROUP, INC.
OBJECTION AND RESERVATION OF RIGHTS RELATING TO DEBTORS' MOTION
FOR ORDER PURSUANT TO 11 U.S.C. §§ 105 (a) AND 502(c) (A) ESTIMATING AND
SETTING MAXIMUM CAP ON CERTAIN CONTINGENT OR UNLIQUIDATED
CLAIMS AND (B) APPROVING EXPEDITED CLAIMS ESTIMATION PROCEDURES
WITH RESPECT TO CLAIM NUMBER 15513

Johnson Controls Battery Group, Inc. ("JCI") responds to the Debtors' Motion for Order
Pursuant to 11 U.S.C. §§ 105(a) and 502(c) (A) Estimating and Setting Maximum Cap on

¹ The Debtors extended the response date and time vis a vis Johnson Controls Battery Group, Inc. for this claim from September 20, 2007 to September 24, 2007 at 5:00 p.m.

Certain Contingent or Unliquidated Claims and (B) Approving Expedited Claims Estimation Procedures (“Estimation Motion”) with respect to JCI claim number 15513 as follows:

1. JCI filed claim number 15513 against the Debtors in connection with the various contractual dealings between JCI and various Delphi entities.

2. JCI objects to the Debtors’ Estimation Motion because it does not preserve the right for JCI to assert either a rejection damages claim in connection with any executory contract that the Debtors reject during these chapter 11 proceedings or a cure claim in connection with any executory contract that the Debtors assume during these Chapter 11 proceedings.

3. JCI expressly reserves the right to amend claim number 15513 or to otherwise seek additional amounts over and above the Capped Amount sought to be imposed by the Debtors for rejection damages in the event that the Debtors reject JCI contracts or for cure in the event that the Debtors assume JCI agreements.

Dated: September 24, 2007

RESPECTFULLY SUBMITTED

Johnson Controls Battery Group, Inc.

By: /s/ Elena Lazarou

REED SMITH LLP
599 Lexington Avenue
New York, NY 10022
Telephone: 212-521-5400
Facsimile: 212-521-5450

Of Counsel

Stephen T. Bobo
REED SMITH LLP
10 South Wacker Drive
40th Floor
Chicago, IL 60606
Telephone: 312-207-1000
Facsimile: 312-207-6400